

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

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**DECLARATION OF JOSEPH R. SAVERI  
IN SUPPORT OF PLAINTIFFS' MOTION TO APPOINT LEAD CLASS COUNSEL**

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I, Joseph R. Saveri declare:

1. I am the Founder of the Joseph Saveri Law Firm, LLP ("JSLF") and am its Managing Partner. I am an attorney of record in this matter. I submit this Declaration in support of Plaintiffs' Motion to Appoint Lead Class Counsel pursuant to Fed. R. Civ. P. 23(g). I have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would testify competently to them.

2. My firm is one of the law firms representing Plaintiffs in the above-captioned matter.<sup>1</sup> I submit this declaration in support of Plaintiffs' Motion to Appoint the Joseph Saveri Law Firm, LLP as Lead Counsel and to Appoint Leadership Structure.

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<sup>1</sup> The other firms are Turner Feild, PLLC; Paul LLP; Hartley LLP; and Gustafson Gluek PLLC.

3. Attached at **Exhibit 1** is a true and correct copy of a firm profile maintained by JSLF, describing the firm's activities, areas of expertise, and accolades.

4. Attached at **Exhibit 2** is a true and correct copy of a firm profile maintained by Gustafson Gluck, PLLC, describing the firm's activities, areas of expertise, and accolades.

5. Attached at **Exhibit 3** is a true and correct copy of a firm profile maintained by Hartley LLP, describing the firm's activities, areas of expertise, and accolades.

6. Attached at **Exhibit 4** is a true and correct copy of a firm profile maintained by Paul, LLP, describing the firm's activities, areas of expertise, and accolades.

7. Attached at **Exhibit 5** is a true and correct copy of the Van Turner Jr Curriculum Vitae, describing his activities, areas of expertise, and accolades.

8. I am leading JSLF's team on this case with Steven N. Williams and Ronnie Seidel Spiegel.

9. Prior to filing the Complaint on December 20, 2020, JSLF and the leadership firms took significant steps to identify, investigate, and advance the claims in this litigation. Attorneys for JSLF performed substantial work investigating the merits of Plaintiffs' claims, including extensive investigation of the cheerleading industry as to both All Star cheer and school cheer, and the markets for cheer competitions, cheer camps, and cheer apparel (the "relevant markets"). JSLF consulted experts to analyze All Star cheerleading and school cheerleading, and to make a preliminary assessment of the economics of the relevant markets, damages, and the viability of Plaintiffs' claims. JSLF also conducted research on Defendants and performed legal and factual research regarding Plaintiffs' claims under state and federal laws. JSLF continues to develop and investigate the merits and damages claims in the *Jones Action* through retention of experts and other work.

10. JSLF is led by Joseph R. Saveri and Steven N. Williams, two of the nation's leading antitrust lawyers. Mr. Saveri and Mr. Williams collectively have over 50 years of professional and leadership experience in litigating antitrust claims on behalf of consumers. Both Mr. Saveri and Mr. Williams are rated AV Preeminent by LexisNexis Martindale-Hubbell and were ranked "Band 1" attorneys by Chambers USA in its "Antitrust: Mostly Plaintiff" category for 2018 and 2019.

11. JSLF's recent appointments as lead counsel include *In re Capacitors Antitrust Litigation*, Case No. 17-md-02801-JD (N.D. Cal.); *In re Restasis Antitrust Litigation*, MDL No. 02819 (NG) (LB) (E.D.N.Y.); *In re High-Tech Employee Antitrust Litigation*, Case No. 11-cv-2509 (N.D. Cal.); *In re Cipro Cases I and II*, JCCP Nos. 4154 and 4220 (Cal.); *In re January 2021 Short Squeeze Trading Litigation*, Case No. 1:21-md-02989 (S.D. Fla.) (co-lead for antitrust tranche); *In re Outpatient Medical Center Employee Antitrust Litigation*, Case No. 1:21-cv-00305 (E.D. Ill.).

12. Prior to joining JSLF, Ms. Spiegel was a partner at Hagens Berman LLP in Seattle, a leading class action firm, where she worked between 2005 and May 2021. Ms. Spiegel has been selected by Lawdragon as one of its 500 Leading Plaintiff Financial Lawyers (2019-2021) and was selected as one of the National Trial Lawyers: Top 100 (2019-2020). She has also been a member of the Sedona Conference Working Group 1 on eDiscovery and is one of the co-drafters of the Revised Commentary on Rule 45, published October 2020. Ms. Spiegel has devoted nearly her entire career to litigating antitrust price-fixing and monopolization class actions on behalf of plaintiff classes, managing large class action cases through all phases of litigation from filing through class certification, summary judgment and trial.

13. JSLF makes diversity a priority and is committed to providing substantive opportunities for junior members of its team, a commitment that fosters the next generation of attorneys.

14. JSLF routinely advances significant costs of litigation without the use of outside litigation funds. We have done so in this case to date, and we are prepared to do so in the future.

15. JSLF has highly experienced attorneys and ample support staff to manage and staff a large, complex action such as this one, and we are well prepared to do so in a cost-efficient manner.

16. JSLF and the leadership firms have a reputation for dealing cooperatively with co-counsel, defense counsel, and the Court.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 10, 2023 in San Francisco, California.

By: /s/ Joseph R. Saveri  
Joseph R. Saveri